**RTO 90221 Western Sydney Region**

**Continuous Improvement Strategy - 2010 Component**

A Summary of this Document:-

This document has been developed from the RTO Support Visits currently being held across the region and outlines the content of discussions held at each school during 2010 and those planned for term one 2011. It forms a valuable part of the RTO’s continuous improvement strategy and should be read in conjunction with several other documents, namely:-

* RTO90221 Western Sydney Region Continuous Improvement Strategy – July 2008
* Individual school internal audit reports – 2009
* Regional summary of the 2009 internal audit process

Also contained within this document (on the final page) are a number of recommendations for further continuous improvement. These recommendations will form the basis of further support visits and professional development activities in 2011 and 2012.

An Overview of the Content of the 2010 / 2011 RTO Support Visits – Western Sydney Region

Introduction

Western Sydney Region RTO has devised and implemented a continuous improvement process for the period from 2007 to 2013. The process is based upon a cycle of support:-

1. Internal Audits
2. VETAB External Audit
3. Internal Audits
4. RTO Support Visits Round One
5. RTO Support Visits Round Two
6. Internal Audits
7. VETAB External Audit

From March 2011 VETAB will become a Commonwealth body, rather than a NSW state body and this may impact upon the scheduling of proposed external audits, but in the meantime the RTO will be assuming that VETAB will adhere to the previously advertised timetable.

Unlike most other regions and dioceses in NSW, VETAB did not issue Western Sydney Region with any written improvement recommendations at the conclusion of the 2008 external audit. The VETAB auditors, did, however, have a conversation with the RTO managers and provided feedback on some of the matters that may need to be addressed before 2013. One of the aims of the RTO Support Visits is to outline, explain and address those matters raised by VETAB in 2008.

Another aim of the RTO Support Visits is to outline and consider any matters that were identified in the 2009 internal audits. It should be noted that the internal audit process itself is being reconsidered to ensure that the 2012 internal audit process will be less confrontational and more inclusive than the 2009 process. The schools and the region will need to work together more closely over the next few years in the lead up to the 2013 external audit. Each school has a copy of their own internal audit report, but it should be realised that no school “failed” the internal audit and any matters included in the report were merely an indication of where further improvement may take place. One of the aims of the Support Visits is to address any matters that arose and design a positive path forward.

Both the 2008 external audit and the 2009 internal audits, plus various surveys and discussions with VET teachers, have identified the following two main matters that should be addressed as part of the continuous improvement process;-

1. Assessment, and,
2. Evidence

Of course, these two things are inextricably linked, but for purposes of analysis and discussion, they will be treated separately during the Support Visits.

It should be noted that the matters that were raised by the improvement process were not common to all schools, but in order to ensure that all schools are at the same minimum level before 2013, all the matters are being addressed at all the schools via this discussion and presentation.

1. Matters that arose from the 2008 and 2009 Audits regarding Assessment

Definition – *“Assessment is the process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a Training Package or by the learning outcomes of an accredited course.”*

Over-Assessment

It became quite noticeable during the audits that there has been a chronic degree of over-assessment by VET teachers in the region. Over-assessment can take various forms and this document aims to address all of the identified reasons for over-assessment. This document should be read in conjunction with the “*Western Sydney Region 2010 Assessment Handbook”*, which can be found on the regional wiki page. In some cases, over-assessment techniques have developed over a long period of time and have come to be understood by many as a required practice, when in fact they are not. A classic example is the belief by many VET teachers that every assessment needs to be carried out three times when in fact this is not and never has been a requirement. This particular issue will be dealt with in more detail later in this section of the document.

50% Assessment Marks

Another common misconception concerning assessment was the previously widely-held belief that a 50% assessment mark was required for all HSC courses, including VET Framework courses. All VET teachers in the region are no longer attempting to generate this mark and understand that the only mark that is required to be generated for the Board of Studies is an examination guesstimate, but there are still a number of school executive staff who are pushing for VET teachers to develop a 50% assessment mark for VET courses because, in their own words “all other HSC courses are required to do so”. VET Framework courses do not require a 50% assessment mark. If teachers were to generate such a mark, then there would be nowhere for the mark to be submitted anyway.

Delivering 2 Qualifications

There is still a degree of confusion on how a VET course delivers two qualifications simultaneously. It appears that a number of teachers are finding it challenging to achieve the correct balance between the two levels required. Most of the VET Framework courses, except Information Technology and Entertainment, are delivering a Certificate II qualification, so in the rest of this document the AQF qualification will be referred to as the “Cert II” component. It should be stressed that both the VETAB audit and the RTO internal audits are only concerned with the Cert II or III component, not the HSC component of the VET Framework course.

If one reads the TAFE Handbook and looks at the entry requirements for a Cert III course, it will say that a student is required to have “a NSW School Certificate or equivalent”. A Cert II is rarely, if ever mentioned. The TAFE web site mentions school certificate equivalents, when referring to the new school leaving age:-

***“School Certificate equivalents\****

***The following are considered to be equivalents to the School Certificate:***

1. ***Completion of a*** [***TAFE NSW Certificate II in General and Vocational Education (CGVE)***](https://www.tafensw.edu.au/howex/servlet/Course?Command=GetCourse&CourseNo=6512) ***OR***
2. ***Completion of a post-school course at AQF Certificate II level or higher OR***
3. ***A combination of study and work or life experience.***

***\*With the introduction of the new school leaving age, the equivalent to year 10 is the completion of a TAFE NSW vocational AQF Certificate II, approved by the minister.”***

The TAFE documents indicate, therefore, that a Cert II qualification is of a similar level to the NSW School Certificate. The AQF Implementation Handbook describes Cert II in the following way:-

***“Breadth, depth and complexity of knowledge and skills would prepare a person to perform a defined range of activities most of which may be routine and predictable.***

***Applications may include a variety of employment-related skills including preparatory access and participation skills, broad-based induction skills and/or specific workplace skills. They may also include participation in a team or work group.”***

On the other hand, if one looks at the entry requirements for TAFE Diploma courses (eg Property Services) then one finds statements such as this:-

***“Entry requirements***

***NSW HSC or equivalent or Certificate IV Property Services (Real Estate) 17672.”***

The AQF Implementation Handbook describes Cert IV in the following way:-

***“Breadth, depth and complexity of knowledge and competencies would cover a broad range of varied activities or application in a wider variety of contexts most of which are complex and non-routine. Leadership and guidance are involved when organising activities of self and others as well as contributing to technical solutions of a non-routine or contingency nature.***

***Performance of a broad range of skilled applications including requirements to evaluate and analyse current practices, develop new criteria and procedures for performing current practices and provision of some leadership and guidance to others in the application and planning of the skills.***

***Applications involve responsibility for, and limited organisation of, others.”***

From this information it can be seen that within a VET Framework course, teachers are required to deliver a Cert II qualification at roughly a School Certificate level, and a HSC 2 unit course at roughly a Cert IV level. How can these two requirements be managed simultaneously? One way of expressing an answer is through the following diagram;-

As the diagram shows, the Cert II is part of the HSC course. It is not a separate course, but integrated within the HSC. To achieve a Cert II, a student is required to be assessed as competent in a list of units of competencies, at a Cert II level, not at a Cert IV level. To achieve an HSC, a student is required to demonstrate that they have successfully addressed the learning experiences found in the column headed “HSC Requirements and Advice” in Part B of the syllabus.

Please note the different language being used. For the Cert II component, the student needs to be assessed as “competent” or “not yet competent”. For the HSC requirements the student is required to have “addressed the key terms and concepts”. That is to say, VET teachers are not required to set competency based assessment tasks for all the terms and concepts in the HSC Requirements column, only for the unit of competency listed as “Unit Title” in Part B of the syllabus, and then, at a Cert II level only. Addressing the key terms and concepts could be achieved through a variety of teaching and learning methods other than a formal “assessment task”. For a student to be considered to have satisfactorily completed a VET Framework course to HSC level there must be sufficient evidence that the student has:

* Followed the course developed or endorsed by the Board
* Applied themselves with diligence and sustained effort to the set tasks and experiences provided in the course by the school
* Achieved some or all of the course outcomes
* Undertaken the mandatory work placement.

The VETAB audit process is only concerned with the smaller circle in the diagram – “Cert II”. The “evidence” mentioned above for the VET Framework course is not limited to evidence of competency. A number of teachers have been attempting to develop and administer assessment tasks at a Cert IV level in order to deem the student competent or not yet competent for the HSC component (the larger circle) of the Framework course. This is not necessary. The HSC component can be delivered and evaluated in the same way as other HSC courses. If the student does not meet the requirements as set out above, then an “N” award could and should be awarded. Some teachers are reluctant to issue N awards for VET courses. As a rule of thumb, VET courses should be treated the same way as any other HSC course. If for example, as a teacher you also deliver History at a 2 unit level, then ask the question, “If this student was performing at this level in my History class, would I give them an N award?” if the answer is yes, then you should give the student an N award for the VET subject.

As a DET teacher, you are indicating that a student in your VET class has completed a 2 unit HSC course at the appropriate level, whether the student chooses to sit for the exam or not. All the same “due diligence” requirements apply for VET courses as for other HSC courses. If the student does not sit for the exam, they will still have “2 Units of Hospitality” or whichever VET course they are undertaking, on their HSC. It is you, as their teacher that decides whether this should be shown there or not, and it does not matter whether the student decides to sit for the exam or not. If you believe that the student does not meet the “due diligence” requirements of the Board, then you should issue them with an N Award. Of course, all the usual N Award documented evidence is still required.

Exams

Many students in the region attempt the HSC exam, even though it is an optional exam. Some VET teachers have indicated that they “find it difficult to find time to prepare the students for the exam because they have so many assessments to complete for the course”. One would be inclined to believe that a teacher who says this is probably over-assessing the Cert II component of the course. With more time and preparation our students can achieve excellent results in the HSC exams. It should be stressed that neither the VETAB audits nor the RTO internal audits are concerned with the HSC exams, but from a DET regional point of view, the VET exams are extremely important and one of the challenges for the region over the next few years will be to increase the level of support for exam preparation.

In some schools in the region, it has been noted that for 85% of the students undertaking VET courses, their VET result was their best result in the HSC. A growing number of students in the top 100 have a VET mark included in their results. With proper preparation, students can excel at the VET exam, but there appears to be a mind-set flowing from the past which implies that students doing VET courses are less able than other students and therefore should not even be attempting the exams.

Some teachers have also expressed the belief that VET courses are “scaled down” in the HSC and therefore there is little incentive for the students or the school. This is not true. The UAC and Board of Studies information shows that courses are not scaled, cohorts of students are scaled. Indeed, if students from one VET course are being “scaled down” in any one year it is because they have not done as well in their other subjects. Even if a student is “scaled down” they are still more likely to gain a higher mark in a course they like and can understand than in one they find difficult and cannot understand. Studies show that students choosing a difficult subject because they believe it will be scaled up usually fare much worse than if they had chosen the so-called “easy” subject and done well at it.

Assessing Three Times

Many VET teachers have indicated to me that they believe either or both of these statements to be true:-

* Each unit of competency needs to be assessed three times before a teacher can be certain that a student is competent
* If a student has not achieved competency after three attempts then they should not be given any more attempts

Neither of these statements is correct. I believe the number “three” may have arisen from the “Triangulation of Evidence”. This theory states that when determining competency, it is best to obtain evidence from three different sources, but it does not say that the student should be assessed three times. Neither does it say that students should ONLY be assessed three times.

As a professional, and a qualified assessor, you as a VET teacher make the decision, based on the evidence you believe will enable you to deem the student competent. If you believe that the student has demonstrated competence, then you do not need to continue assessing them. `

Assessing at the Correct Level

As indicated earlier in this document, most VET teachers are delivering a Cert II AQF qualification as part of the BOS HSC course. However, it appears that many teachers are attempting to assess the Cert II component at a Cert IV level. Some teachers are including all the information in the column “HSC Requirements and Advice” in their Cert II assessment tasks. This is not required and may be part of the reason that some teachers say that the assessments take up so much of their time that they have no time left to prepare students for exams.

An example might be seen in the unit “Follow health, safety and security procedures – SITXOHS001A”. Part B of the syllabus explains that for students working in the industry *“they would be required to apply little discretion and judgement because they operate within predefined organisational OHS procedures”.* The element of competency number 2 – “Follow procedures for emergency situations”, explains the performance criterion that is embedded within the unit of competency that is being assessed: - *“Recognise emergency and potential emergency situations promptly and determine or take required actions within the scope of individual responsibility”.*

The student will need to have a grasp of some underpinning knowledge – in this case understanding what constitutes an “emergency situation”, but in terms of Cert II assessment, all that is required to be determined is, can the student;-

1. Recognise emergency and potential emergency situations promptly, and
2. Determine or take required actions within the scope of their responsibility?

These two things listed above are part of the Cert II assessment, however, in the “HSC Requirements and Advice“ column, students are required to have learning experiences which address such things as taking adequate breaks, stress management techniques, poor ergonomics etc. These are part of the HSC course and you are required to ensure that they are addressed as part of the 2 unit course (whether the student is undertaking the exam or not), but they are not required to be part of the assessment task regime for Cert II.

Assessing Units of Competency, not Performance Criteria

When VETAB audited our RTO in 2008 one of the matters discussed was that our students appeared to have a “disjointed” understanding of the course and the workplace. It was indicated that our students had strong knowledge of various components of the course, but, they often did not understand how all the pieces fitted together and were not always work-ready. This could be a result of teachers assessing performance criteria, rather than units of competency.

In Part B of the syllabus, the unit of competency to be assessed is shown in bold eg ***“Follow workplace hygiene procedures – SITOHS002A”.*** It is this unit of competency that is required to be assessed. Underneath this unit there are 15 performance criteria. The performance criteria do not each require a separate assessment task. They are part of the whole unit of competency that is being assessed. In other words – only one assessment task is required in this case, not fifteen.

Furthermore, VETAB expect us to combine several units of competency together for assessment eg three units. This would mean that only one major assessment task is required, not three, and definitely not 45.

Employability Skills

VETAB have made it known that when they return in 2013 they will be looking at how we deliver Employability Skills as one of their priorities. The syllabuses give a brief run-down of employability skills and indicate that they *“are essential features of each of the qualifications available in the Framework and therefore consideration must be given to the ways in which they can be addressed when designing learning activities and assessment instruments”.* \*This remains one of our major challenges for the next two years.

\*Perhaps the first step towards ensuring the delivery of employability skills is to make certain that the units of competency are combined for holistic assessment and that units are being assessed, rather than performance criteria. The second step will be to examine each of the RTO’s Learning and Assessment Strategies and ensure that Employability Skills are given prominence.

Combining units for holistic assessment

For most of the Framework courses, the Cert II component consists of between 15 and 20 units of competency. VETAB are asking us to combine our assessment and delivery into groups of units – usually about 3 each. This would mean that for most Framework courses, teachers would only be required to undertake between 4 and 7 assessment tasks over two years (between 2 and 4 a year).

\*To achieve this and still address employability skills etc, it may be necessary for the RTO to have another look at the assessment tasks being recommended for the region. This is another challenge that the RTO will be facing over the next two years.

The Learning and Assessment Strategy (LAS)

The RTO produces a LAS for each qualification that it delivers and recently it has become obvious that there has been some confusion about the derivation of the LAS and its purpose. The LAS is perhaps best illustrated by the following diagram:-

The larger circle represents the Industry Training Package. This contains all the qualifications associated with that industry. For example, the Metals industry training package contains information about boat-making and caravan-making courses.

The next circle represents the BOS syllabus. The BOS selects certain qualifications from the training package and deems that schools may be able to deliver these particular qualifications. As illustrated, the BOS syllabus does not include all the qualifications within the training package.

The next largest circle represents the RTO’s scope of delivery. RTOs are required to have their scope of delivery registered by VETAB, and indeed that is what the audit is all about. As illustrated, the RTO has a scope that is smaller than the syllabus, so not everything in the syllabus can be delivered by the RTO. The RTO may also retain qualifications that are no longer in the syllabus or the training package. These cannot be delivered by schools because as part of DET our RTO is only able to deliver courses through the HSC pathway (i.e. they must be in the syllabus).

The smallest circle represents the teachers’ qualifications. As the diagram shows, teachers are not trained to deliver everything that is in the syllabus, nor everything that is on the RTO’s scope of delivery. In some cases teachers are qualified to deliver courses that are not in the syllabus, but once again, as part of the DET our RTO can only deliver courses that are actually in a BOS syllabus.

The LAS is derived from the area where the four circles intersect. This intersection represents the total sum of what the RTO can deliver. The LAS examines what is in this intersection and makes it into a coherent delivery strategy. The LAS is not something that is pre-determined by Regional or Directorate staff. It merely represents what is available to schools at any particular time. The LAS also suggests a sequence of delivery but this may be subject to change and negotiation, especially if the RTO moves towards a more holistic method of assessment.

Of course, as noted by recent events, the intersection of the circles and therefore the LAS, can change dramatically. Usually the change is brought about by a movement in the industry training package. Industry representatives are constantly examining the relevance of their training package to the needs of their industry. If they decide that the package needs to be updated, then they will go ahead and do that, and then it is responsibility of the RTO or the DET system to “chase” this package by changing the scope, rewriting the syllabus and/or having teachers receive extra training. Recently, the Hospitality Training package moved significantly away from the syllabus and from the RTO scope of delivery. Suddenly the RTO was able to deliver far fewer courses and the new LAS that was produced reflected this reduction. Since that time the DET system and the region have paid enormous sums of money to have teachers receive extra training in an attempt to “chase’ the industry training package. It remains to be seen how sustainable this approach will be in the future.

The regional LAS will continue to change frequently. This is because it reflects the fact the economy is always changing and that the Industry Training Package will constantly be adjusted to ensure that industry training matches the changes in the economy. The changes in the economy, leading to changes in the Training Package, and therefore changes in the LAS are likely to accelerate, not slow down.

Tasks vs Tools

In some of the literature about assessment there is often a degree of confusion about the definition of “assessment tasks” and “assessment tools”. In some readings the two are considered interchangeable. In others, the task includes the tools whereas in others the tool includes the tasks. From the RTO point of view, the current acceptable definition is that the task is what is given to the student to perform, whereas the tool is the overarching document that includes the task. The tool also includes lists of competencies etc and details of course structures etc.

1. Matters that arose from the 2008 and 2009 Audits regarding Evidence

What is Evidence?

Definition – “*Evidence is information gathered to support a judgement of competence against the specifications of the relevant unit/s of competency”.*

Some teachers believe that the only way to gather evidence of a student’s competence is to actually observe the student as they perform a task. This is not true. In fact, it is theoretically possible but not necessarily recommended to assess a student as competent for Cert II without ever actually observing them do anything. All the evidence could be gathered from other sources.

Evidence falls into four basic categories with a number of sub-categories:-

1. Real work / real time activities
   1. Observation
   2. Work products
   3. Diary
   4. Third party feedback
   5. Self-assessment
2. Structured activities
   1. Simulation
   2. Role play
   3. Case study
   4. Project
   5. Presentation
   6. Learning activities
   7. Demonstration
3. Questioning
   1. Verbal questioning
   2. Written questioning
   3. Interview
4. Portfolio
   1. Examples of learning activities
   2. Work samples
   3. Training record
   4. Assessment record
   5. Journal
   6. Task exercises

As demonstrated by the above list, observation is merely one of about 20 different methods of obtaining evidence. From discussions with VET teachers it appears that most of the other 19 methods are rarely used. In particular the “Portfolio” methods of gaining evidence are largely not understood or used by VET teachers. The portfolio methods shift the onus of providing evidence back to the student and this is often the pattern followed in TAFE and by private providers. A student could, for example, be given an assessment task early in the year and asked to submit it later in the year. During the time period they could regularly discuss with the teacher how their project is proceeding. The discussions could centre around a student journal which includes photos, drawings, written testimonials etc. These discussions, together with the journal they are keeping would provide the evidence required.

Triangulation of Evidence

This theory states that best practice is to obtain diverse sources of evidence. It is suggested that three sources would be best. This could mean for example, that you have a discussion with the student, you examine their journal and look at work samples. This theory is often misunderstood to mean that you should assess everything three times.

Third Party Evidence

This is another source of evidence that is greatly underutilised by VET teachers. It involves having discussions or gathering evidence from other people who are in a position to provide you with meaningful feedback about the student. This could include the student’s employer or work placement supervisor for example. The evidence should be gathered in a structured manner eg by using a checklist and could form a part of the total evidence gathered. The actual degree to which the evidence is considered adequate to deem the student competent would be a decision made by the VET teacher in their role as a qualified assessor. In some cases, third party evidence may be enough for the teacher to deem the student competent. This would particularly be the case where the evidence is coming from the student’s employer.

Forming strong relationships with employers or work placement supervisors could reduce the workload for VET teachers significantly if they can gather increasing amounts of third party evidence. The evidence can be gathered by face to face discussions, over the telephone, through the mail, through emails, by photographs and by videos.

Work Placement as Evidence

The RTO has a great potential to gather evidence from this source. At the moment this source of evidence is largely underutilised. In order to successfully use this source the RTO must develop greater quality work placements and stronger relationships between teachers and employers.

\*This is a challenge for our RTO over the next two years.

Holistic Evidence

The discussions with VETAB suggested that the RTO should move towards the use of more holistic assessment. This movement will necessitate a more holistic gathering of evidence. In the past there has been a tendency to assess and gather evidence about individual components of a unit of competency rather than looking at the holistic picture. For example, a student working in a retail situation may have been observed using a cash register and talking to customers but the assessor would only gather evidence from one of these activities because the other activity is for “some other time”. This approach splits the course into minor components and tends to make it difficult to consider employability skills.

\*Moving towards a more holistic system of evidence gathering is another challenge for the RTO over the next two years.

Record Keeping

Many of the record keeping sheets provided in the past were based on a list of performance criteria. This has been another reason for gross over-assessment across the region. Obviously, students must be proficient in the performance criteria to be deemed competent in a unit of competency, but the assessor is not required to undertake a separate assessment task for each performance criteria. Also, they are not required to assess each one three times, as has been commonly misunderstood by many teachers.

It is planned for the RTO to move away from the previous system of “boxes” for record keeping towards something that lends itself more to holistic delivery and assessment. Exactly what form that will take will be determined by the teachers themselves. The follow up support visit in 2011 will ask teachers to provide examples of how they would see the record keeping being improved over time. These examples will form the basis of a series of recommended templates for the region in 2012.

In global terms, the RTO is required to keep records through eBOS and to keep sample completed assessment tasks (for 30 years). eBOS will be updated in 2011 so that only the qualifications that can be delivered in this region will be shown as options when Western Sydney schools log on. It will also enable schools and the region to develop some meaningful graphs and tables for improvement purposes.

RTOs are also required to keep sample completed assessment tasks. If for example, a teacher has a class of 20 students then they are required to keep a copy of one student’s completed task. This does not mean that they have to keep the student’s completed product, just their task. If this can be done electronically, then this will make it easier for everyone. Given that holistic assessment means that each class will have maybe 6 tasks over 2 years, then the teacher will be keeping 6 completed tasks for that course. This is obviously a work in progress so do not start building a new storeroom at this stage.

\*Developing and implementing a new system of record keeping is also a major challenge for the RTO over the next two years.

Follow-Up Visits

The first round of visits and the delivery of the information in the above document will be before the end of term 1, 2011.

The second round of visits will commence in term 2 2011. The second round of visits will include ongoing discussions with teachers about the “homework” matters mentioned in the above document (marked with an \*). These matters are:-

* Employability skills
* Recognition of VET for more able students, plus successful exam results (note – this is a DET regional matter and not a VETAB matter)
* Holistic assessment
* Work placement as evidence
* Holistic system of evidence gathering
* Developing and implementing a new system of record keeping

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